

August 15, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Vision Pharma Technologies, LLC supports the continued allowance of the following substance(s):

Name of Substance	Location on National List	Reason for continued allowance.	Supporting Documents
Calcium phosphate	205.605(b)	Flow agent in powders	Previous NOSB assessment still relevant
Sticky traps/barriers	205.601(e)	Pest control management in warehouse.	Previous NOSB assessment still relevant
Pheromones	205.601(f)	Grain facilities are subject to stored grain pests; monitoring and identifying which insects may be present is a critical part of the total pest management program.	Previous NOSB assessment still relevant.
Vitamin D3	205.601(g)	Rodent population control on exterior ground of food processing facility	Previous NOSB assessment still relevant.
Bentonite	205.605(a)	Agent used in decolorizing oils.	Previous NOSB assessment still relevant.
Citric Acid	205.605(a)	Used as a preserver in oils and shortenings, and as a degumming agent in refining oils.	Previous NOSB assessment still relevant.

Calcium Chloride	205.605(a)	Cofactor for enzymes in the production of organic syrups.	Previous NOSB assessment still relevant
Calcium Sulfate	205.605(a)	Used for pH adjustment and water softener.	Previous NOSB assessment still relevant.
Diatomaceous earth	205.605(a)	Pure organic substance necessary as filtering and bleaching agent in refining oils.	Previous NOSB assessment still relevant.
Enzymes	205.605(a)	Hydrolysis of starch.	Previous NOSB assessment still relevant.
Flavors – Natural Flavorings	205.605(a)	Honey flavoring of naturally occurring substance necessary for flavoring food products.	Previous NOSB assessment still relevant.
Lactic Acid	205.605(a)	Used for pH adjustment.	Previous NOSB assessment still relevant.
Nitrogen	205.605(a)	Oxygen barrier for storage of refined oil.	Previous NOSB assessment still relevant.
Sodium Bicarbonate	205.605(a)	Used for pH adjustment and primary leavening agent in baking.	Previous NOSB assessment still relevant.
Sodium Hydroxide	205.605(a)	Used for pH adjustment.	Previous NOSB assessment still relevant.
Calcium Hydroxide	205.605(b)	<p>It has been determined by the NOSB to be consistent with the Organic Foods Production Act, its implementing regulations and criteria for substances allowed in organic production and handling.</p> <p>Calcium Hydroxide is necessary in the purification of the freshly squeezed cane juice that is concentrated and crystallized to produce the organic sugar that is common in our diet and essential to the formulation, flavor and consistency of finished products.</p>	Previous NOSB assessment still relevant.

Ozone	205.605(b)	Used as a disinfectant of food processing equipment to minimize/eliminate microbial growth	Previous NOSB assessment still relevant.
Potassium Carbonate	205.605(b)	Technical aid for taste, color, and solubility. Alkalizing agent for cocoa since 1828 and there is no acceptable alternative. None of this substance is present in the final product.	Previous NOSB assessment still relevant.
Potassium Hydroxide	205.605(b)	USDA approved boiler chemical – Controls buildup of minerals in boiler used for steam processing.	Previous NOSB assessment still relevant.
Chlorine Materials - Sodium Hypochlorite	205.605(b)	Used for sanitation of food processing equipment to minimize/eliminate microbial growth	Previous NOSB assessment still relevant.
Silicon Dioxide	205.605(b)	Flow agent for powdered food ingredients.	Previous NOSB assessment still relevant
Tocopherols	205.605(b)	Naturally extracted preservative.	Previous NOSB assessment still relevant
Lecithin, Unbleached	205.606	Emulsifier needed in chocolate production.	Previous NOSB assessment still relevant.

Sincerely,

Original signed and mailed to above address and faxed to the above fax number.

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Cc: Organic Trade Association
National Organic Standards Board